



VIA HAND DELIVERY

February 7, 2003

Mr. Joel H. Peck, Clerk
State Corporation Commission
c/o Document Control Center
Tyler Building
1300 E. Main Street, 1st Floor
Richmond, Virginia 23209

**Re: Ex Parte: In the matter concerning the provision of default
service to retail customers under the provisions of the
Virginia Electric Utility Restructuring Act
Case No. PUE-2002-00645**

Dear Mr. Peck:

Enclosed for filing in the above-referenced proceeding are an original and fifteen (15) copies of the Comments of Virginia Electric and Power Company on the Commission's determination of the components of default service, and responses to the questions enumerated in the Order Establishing Investigation entered on December 23, 2002.

Very truly yours,

Karen L. Bell
Senior Counsel

Enclosures

cc: Mr. Ronald A. Gibson
Mr. William F. Stephens
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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

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STATE CORPORATION COMMISSION)	CASE NO. PUE-2002-00645
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Ex parte: In the matter concerning)	
the provision of default service to retail)	
customers under the provisions of the)	
Virginia Electric Utility Restructuring Act)	

**COMMENTS OF VIRGINIA ELECTRIC AND POWER COMPANY
ON THE COMMISSION'S DETERMINATION
OF THE COMPONENTS OF DEFAULT SERVICE**

I. BACKGROUND

On December 23, 2002, the State Corporation Commission ("Commission") issued an Order Establishing Investigation ("Order") in the above-referenced proceeding. In its Order, the Commission directed the Commission's Staff to invite representatives of incumbent electric utilities, competitive suppliers, retail customers and other interested parties to participate in a work group to assist the Staff in determining the components of default service in furtherance of the Commission's obligations under the Virginia Electric Utility Restructuring Act, § 56-576 et seq. (the "Act") of the Code of Virginia, and, specifically § 56-585. Additionally, the Order instructed interested parties to file with the Clerk of the Commission on or before February 7, 2003, any comments it wished to offer with respect to the Commission's determination of the components of default service, addressing, at a minimum, the questions enumerated in the Order.

On January 21, 2003, Virginia Electric and Power Company ("Dominion Virginia Power" or the "Company") filed its Statement of Interest in this proceeding.

II. COMMENTS ON QUESTIONS ENUMERATED IN THE ORDER

The Order seeks input and recommendations on 13 enumerated questions and issues concerning the components of default service. In its response to the questions and issues, the Company has focused on the provision of competitive default service during the period its rates will be capped pursuant to § 56-582 of the Act. The Company believes that the focus of this proceeding should be to determine the components of default service and how competitive default service may be made available during the capped rate period.

Accordingly, Dominion Virginia Power respectfully submits the following comments and recommendations on those questions and issues.

(1) What should be the specific components of default service?

Default service should be defined to include the same components that are included in the definition of electricity supply service contained in the Commission's Rules Governing Retail Access to Competitive Energy Services ("Rules"). The Rules define electricity supply service as follows:

"Electricity supply service" means the generation of electricity, or when provided together, the generation of electricity and its transmission to the distribution facilities

of the local distribution company on behalf of a retail customer.¹

Specifically, default service should include all non-distribution service elements such as generation capacity, energy, generation reserves, ancillary services, and transmission service. Defining the components of default service in this way also aligns with the manner in which the Company's rate schedules were unbundled into distribution and electricity supply service in Case No. PUE-2000-00584.²

- (2) **Whether, given the virtual absence of competition in Virginia's retail generation market, incumbent electric utilities should continue to provide default service at capped rates at the present time; if so, what changes in statute, policy, infrastructure, market conditions, and/or other circumstances are necessary to allow for the practical provision of default service by an entity other than the incumbent?**

The Company believes that the Act contemplates that Virginia's incumbent electric distributors may remain in the role of the default service provider and provide the "safe harbor" of the capped rate to customers during the transition period between the phase-in of retail choice and the end of the capped rate period. Section 56-585.C.1 of the Act provides:

Until the expiration or termination of capped rates, the rates for default service provided by a distributor shall equal the capped rates established pursuant to subdivision A 2 of § 56-582. After the expiration or termination of such capped rates, the rates for default services shall be based upon competitive market prices for electric generation services.

¹ 20 VAC 5-312-10. Applicability, definitions, Rules Governing Retail Access to Competitive Energy Services.

² *Application of Virginia Electric and Power Company for Approval of a Functional Separation Plan under the Virginia Electric Utility Restructuring Act.*

However, the Act also recognizes that, after the phase-in of customer choice has been completed, competitive retail options may be limited. As a result, the Act gave the Commission the authority to consider competitively bidding default service. The Company believes that, given the current state of retail competition in the Commonwealth, the Commission should proceed to more fully develop the concept of competitive default service. The Company does not believe that any changes to the Act or policies are needed at this time, but does think the Commission should consider developing rules or guidelines that address specifically how competitive default service may function.

To that end, the Company has recently announced its intention to file for the Commission's consideration a limited scale competitive default service pilot that would include up to 200 MW, represented by as many as 50,000 customers. The Company discussed its proposed competitive default pilot (the "Pilot") at the January 7, 2003 meeting of the Legislative Transition Task Force ("LTTF"). The Company is currently developing the details of the Pilot and gathering input from interested stakeholders, including the Commission's Staff, competitive service providers ("CSPs"), consumer representatives, and independent power producers, with the expectation to file the proposal with the Commission before the end of the first quarter of 2003.

The goal of the Pilot would be to provide a laboratory in which: (1) interim rules for competitive default service can be developed and tested; (2) volunteering and random selection processes could be tested to aggregate customers into groups that the prospective default providers would bid to serve; (3) the Commission could test different processes and procedures for running a competitive auction and selecting the winning

supplier(s); and, (4) different approaches to address issues related to consumer protection and customer communication / education related to competitive default service can be tested in practice.

The Company intends to propose competitive default service rules in the form of a tariff in its Pilot filing. At this time, the Company believes that the existing rules, data exchange protocols and infrastructure that have been developed for retail access will also accommodate competitive default service. That is, CSPs will still be required to secure a license from the SCC and register with the Company as they typically would have to do in order to serve retail customers. Once the customers are selected and the bidding process completed, the retail access procedures for enrollment, billing, metering, payment processing, etc., will be the same as those in place today. Additionally, the Company is proposing to conduct its Pilot for two years, 2004 and 2005, so adequate time exists thereafter before capped rates end, to modify the statute, develop final rules, business processes, and infrastructure, if the Pilot demonstrates such changes are needed.

Examples of the types of issues that the Company's Pilot tariff must address include but are not limited to:

- a) Any entity bidding on default service according to § 56-585.B must be a CSP that has been licensed by the Commission.
- b) CSPs bidding on default service must comply with § 56-587 of the Act with particular attention to proof of adequate access to generation and generation reserves according to § 56-587.B.2 in addition to the characteristics and qualifications outlined in § 56-585.B.1.

- c) There must be a form of contract between the CSP(s) that win the bids and the customers that they are assigned to serve;
- d) If CSPs bid on default service for a stated number of customers in a customer class or across several customer classes for a stated period of time and are selected as a default service provider, then there must be a means to address attrition from the stated number of customers. Attrition refers to the erosion of, or reduction from, the stated customer levels due to customers switching to another CSP, customers returning to the incumbent utility's capped rates, or customers discontinuing service for any other reason. Such customers should be replaced from the pool of customers being served under the incumbent utility's capped rates to the extent that there is a sufficient number of customers remaining on capped rates for replacement who are willing to be served by the competitive default service provider.
- e) Bids should be evaluated on the basis of price and non-price factors, with those factors and their relative weighting specified in advance.
- f) Contingencies must be specified to address circumstances where a CSP sells its business to another CSP, surrenders its license in the Commonwealth, or fails to fulfill its obligations.
- g) Service to customers provided by CSPs must be provided in compliance with Commission rules, the Dominion Virginia Power CSP tariff and, if applicable, RTO business rules for load serving entities.

The Default Service Workgroup that the Commission Staff will lead beginning March 4, 2003 will have many issues to address based on the initial comments filed in

this proceeding. These issues will be varied, complex and potentially difficult to resolve. While the Company's Pilot filing will contain proposed rules for the provision of default service, the Company believes that the Default Service Workgroup will be an ideal forum for the stakeholders to discuss these rules or guidelines under which the Company's Pilot would be conducted. The Pilot will effectively serve as a laboratory in which the workgroup can provide input into the development of the administrative details related to the Pilot. The workgroup can then monitor the Pilot's implementation and the results that are achieved as it unfolds, and identify any changes that may need to be made before the Commission promulgates competitive default bidding rules.

- (3) **What should be the geographic scope of a default service provider's territory, i.e. statewide, incumbent utility service territory, regions served by specific regional transmission entities; divisions with an incumbent utility's service territory; major metropolitan and surrounding areas, etc.?**

The geographic scope of a competitive default provider's territory should not be limited to regions served by regional transmission entities ("RTEs"), divisions within an incumbent utility's service territory or any other geographic criteria, such as within a metropolitan area. However, it may be necessary to differentiate by utility service territory the default service customers that are made available for bid, since each utility's price-to-compare ("P-T-C") may be different and a CSP must take into account that specific P-T-C when preparing a bid. Also, each utility could have a slightly different load profile for the customers that a CSP would be bidding to serve.

Therefore, the Company believes that a competitive default service program should: (1) recognize distinct and different P-T-Cs and load characteristics of each utility

service territory and (2) provide the opportunity for a CSP to provide default service across the entire state encompassing multiple utility service territories, if it wins all bids.

- (4) **Whether default service, as contemplated by § 56-585 of the Act, should be limited to unregulated services, i.e. is it necessary to designate distribution service as a default service?**

Refer to the response to Question No. 1. As noted, default service should include all components of "electricity supply service," as defined by the Commission's Rules. The non-distribution elements of default service should include generation capacity and energy, reserves, ancillary services, and transmission service. Under the Act, distribution service continues to be a regulated monopoly service and thus the statute does not provide any opportunity for distribution service to be designated as a default service.

- (5) **For generation-related default service, whether the separate components of generation service to retail customers (capacity or resource reservation, energy, transmission, and ancillary services) should be treated as separate default services or bundled into a single service?**

While it is possible for different entities to provide separate components of default service, such transactions would be extremely difficult to administer at the retail level and also difficult for customers to understand. It does not appear reasonable or practical, therefore, for residential and small business customers to procure different components of default service from different suppliers. Accordingly, for these customer classes, transactions involving different components of electricity supply service would be best left to the wholesale market instead of the retail market.

Additionally, as discussed in response to Question No. (8) below, the Company questions whether the provision of competitive default service for large commercial and industrial customers is necessary.

(6) For generation-related default service, whether the service should be delivered to the retail customer or to the incumbent utility?

Generation-related default service as identified in § 56-585.A and § 56-585.B of the Act is based on delivery from a CSP to the retail customer. Section 56-585.A of the Act states the following:

The Commission shall, after notice and opportunity for hearing, (i) determine the components of default service and (ii) establish one or more programs making such services available to retail customers requiring them commencing with the availability throughout the Commonwealth of customer choice for all retail customers established pursuant to § 56-577. [Emphasis added.]

Paragraph A of this section of the Act clearly states that default service is to be made available to retail customers at the time all retail customers have the opportunity for choice.

The Act further states in § 56-585.B:

From time to time, the Commission shall designate one or more providers of default service. In doing so, the Commission:

1. Shall take into account the characteristics and qualifications of prospective providers, including proposed rates, experience, safety, reliability, corporate structure, access to electric energy resources necessary to serve customers requiring such services, and other factors deemed necessary to ensure the reliable provision of such services, to prevent the inefficient use of such services, and to protect the public interest; [Emphasis added]

Paragraph B 1 states that the Commission shall take into account qualifications of prospective providers including access to electric energy resources necessary to serve customers requiring such services. The reference to "customers" in this paragraph refers to retail customers.

Neither paragraph A nor paragraph B 1 uses either the term "distributor" or "incumbent electric utility" as the recipient of default services.³ It is apparent that the transaction is intended to be a retail transaction with customers.

- (7) **Whether the language of the statute prohibits the provision of default service to an incumbent utility on behalf of a group of customers, i.e. could a third party provide service to an incumbent utility for indirect service to retail customers (service to satisfy load growth, specific localities, or to customer subgroups)?**

The language of the statute does not provide for the provision of default service by a third party to an incumbent utility on behalf of a group of customers. As noted in the response to Question No. 6 above, § 56-585.A and B of the Act provide for the direct provision of default service by a CSP to retail customers. Section 56-585.C addresses the process and the pricing under which a distributor would meet its ongoing default service obligation at the conclusion of the capped rate period.

The Company believes it is premature to address this issue at this time, as capped rates will not expire until July 1, 2007. A number of states have proceedings underway to address their distribution companies' procurement of supply in a competitive wholesale generation market to meet their default supply obligation. There are three factors that

³ Pursuant to § 56-576 of the Act, "Distributor" means a person owning, controlling, or operating a retail distribution system to provide electric energy directly to retail customers. "Incumbent electric utility"

distinguish those states from Virginia: (1) their capped rate period is nearing expiration; (2) the distribution companies have been legally separated from generation, either through divestiture or through placement of the generation assets in a legally separate company under the same holding company; and, (3) the distributor must procure power from the market to meet its ongoing default service obligation. The Company recommends that activities in other states (e.g., Maryland) be monitored as they develop. Such activities in other states may provide guidance for the manner in which Virginia handles this issue when capped rates expire.

It should be noted that a form of indirect third party supply exists today. In order to meet its retail default supply obligation under capped rates, the Company may procure power from third party generators in the competitive market to supplement the supply needed to meet native load requirements, or to economically displace Company-owned generating assets.

(8) Whether the provision of default services should differ by customer class?

The load characteristics of some customer classes are quite different from those of other customer classes. Therefore, it may be appropriate to allow for the provision of such services differently between the customer classes. Some CSPs may prefer to serve residential customers, whereas others may want to focus on small or intermediate size business customers. The Company's Pilot will provide an opportunity for the Commission to test this concept in a market environment and determine if such a distinction is necessary.

means each electric utility in the Commonwealth that, prior to July 1, 1999, supplied electric energy to

From the Company's perspective, the provision of competitive default service for large commercial and industrial customers does not seem to be needed. The Company believes that these large users have the capability to procure any or all needed components of electricity supply service from the competitive market without having the Commission conduct a formal bidding process on their behalf and then selecting their CSP.

(9) Whether different components of default service can be provided by different suppliers?

As discussed in the responses to Question Nos. 5 and 8, the Company believes it may be more appropriate for the provision of the components of default service (including generation capacity and energy, generation reserves, ancillary services and transmission service) to be combined together or "bundled" into electricity supply service for residential and small business customer classes. To avoid confusion for these customers, it is more appropriate to address transactions needed to provide the different components of default service at the wholesale level. Therefore, it is the Company's position that a single supplier providing all of the components of default service should serve customers in these classes. Again, the Commission could elect to test this theory in practice as part of the bidding process for the Company's Pilot.

retail customers located in an exclusive service territory established by the Commission.

- (10) Whether default service has the same meaning for different classes of customers, i.e., those who do not affirmatively select a supplier, those who are unable to obtain service from an alternative supplier, or those who have contracted with an alternative supplier who fails to perform?**

The Company does not believe that there is a need to distinguish default service for these different classes of customers during the capped rate period. The Act specifies that, during the capped rate period -- unless the Commission designates another provider or providers of default service -- the Commission may require a distributor to provide electricity supply service at capped rates to a customer that meets any of the three categories of default service (i.e., elected not to switch, unable to find a supplier, or the supplier fails). Since a distinction is not made for default service provided to different types of customers by the distributor, then to be consistent, there should not be a differentiation made when a competitive supplier provides default service.

However, the Company also believes that when the capped rate period ends, there may be a need to differentiate customers that are not served by a CSP into different categories of electricity supply service. The criteria that may define the customer groupings are unclear at this time, and may be different from the three categories currently identified in the Act. There is no clear industry consensus on how to define different default service classes, and even the terminology varies widely. Terms such as standard offer service (SOS), basic generation service (BGS) and provider of last resort (POLR) are being used, and in many cases the same terms are being used with varying meanings in different jurisdictions.

A number of states that are ahead of Virginia in the transition to a fully competitive electricity market, and nearing the conclusion of the capped rate period for at

least some of their utilities and customer classes, are currently working to address and resolve this very important issue. The Company suggests that Commission charge the Default Service Workgroup with the task of: (1) researching and monitoring the developments in other states regarding the differentiation of default service into different types or categories of service; (2) evaluating the appropriateness for Virginia of any industry consensus "best practice" model for default service differentiation that may emerge; and, (3) developing appropriate default service class definitions, if an industry consensus model is not available in the time frame needed. This process will be evolutionary and will take significant time to be accomplished. The goal should be to have the process of differentiating default service classes completed and any resulting actions taken before the capped rate period ends.

(11) How should charges for default service be collected?

As explained in the response to Question No. 2, after customers and CSPs are matched up as part of the competitive default bidding process, all other retail access rules and business processes apply, just as they would under a traditional customer / CSP / distributor relationship. Therefore, billing and collections are functions that can be provided by the distributor or the default service provider according to § 56-581.1 of the Act and 20 VAC 5-312-90 of the Commission's Rules.

(12) Whether metering, billing and collecting services should be deemed components of default service?

As previously explained, default service must be defined to be the same as electricity supply service with respect to the components that it includes. The

Commission's Rules provide for competitive metering and billing services, and the provision of such services should be separate from default service. A CSP that is awarded retail customers to serve under a competitive default service program would have the opportunity to offer CSP consolidated billing or competitive metering in accordance with the Act and the Commission's Rules.

(13) What implications would the alternative provision of default service have for the determination of wires charges?

The Commission's administrative determination of wires charges should be performed independently of the pricing of default service. Under § 56-583 of the Act, wires charges are determined by comparing the capped unbundled generation rates to the projected market price for generation and are the excess, if any, of the capped unbundled generation rate over the projected market price for generation. The method that the Commission has adopted to set the projected market price for generation for the purpose of determining wires charges is unaffected by the number of customers or amount of load taking electricity supply service from a CSP. When customers switch to a CSP, or are part of a group awarded to a CSP by the Commission as part of a competitive default service provider program, the Company will attempt to sell the displaced energy and capacity into the wholesale market. In order to be revenue neutral as the Act intended, the Company must receive the projected market price for its displaced generation. A projected market price and wires charge methodology that maintains independence from information used to establish default service prices is consistent with the principle of revenue neutrality and is appropriate under the Act and the Commission's Final Order in Case No. PUE-2001-00306 dated November 19, 2001.

III. CONCLUSION

Dominion Virginia Power is responding only to the Commission's request for input on the determination of the components of default service at this time. The Company will reserve other comments pertaining to default service for a later time. The Company appreciates the opportunity to submit these comments and to participate in the work group to assist the Staff in determining the components of default service pursuant to § 56-585 of the Act.

WHEREFORE, Dominion Virginia Power respectfully requests that the Commission consider these comments on the questions enumerated in the Order.

Respectfully submitted,

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February 7, 2003

CERTIFICATE OF SERVICE
CASE NO. PUE-2002-00645

I hereby certify that a true copy of the foregoing was either hand-delivered or mailed first class mail, postage prepaid, this 7th day of February 2003 to the each of the following:

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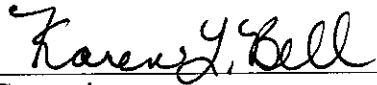
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